

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

UNITED STATES OF AMERICA

v.

SHADONTA LATEEF BEANE,

Defendant.

Case No. 3:21CR054-DJN

STATEMENT OF FACTS

The United States and the defendant, SHADONTA LATEEF BEANE (hereinafter, “the defendant”), agree that at trial, the United States would have proven the following facts beyond a reasonable doubt with admissible and credible evidence:

1. On or about October 1, 2020, in the Eastern District of Virginia, the defendant, knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm and ammunition, all in and affecting interstate and foreign commerce, in violation of 18 U.S.C. § 922(g)(1).

2. In late September 2020, an individual acting under the direction of law enforcement (hereafter, confidential source or CS), engaged in multiple conversations with the defendant via Facebook Messenger, text messaging, and cellular telephone calls. During these conversations, the defendant indicated to the CS that he had a Draco firearm with a 50-round drum magazine for sale for \$1200. The CS indicated that they were interested, and that the reason for purchasing the firearm and ammunition was so that the CS could resell it to other people who were interested in the firearm and ammunition.

3. On October 1, 2020, the defendant advised that he wanted \$1500 for the Draco, but that he would include additional ammunition as well as the drum magazine for that price.

4. On October 1, 2020, the defendant drove to a predetermined location to deliver the firearm and ammunition. Once there, the defendant handed the CS a Romarm/Cugir Mini Draco semi-automatic firearm and a drum magazine. The pair then entered into a residence at the location. The Draco firearm was placed on the kitchen table, and the CS then counted out and handed the defendant \$1400 in United States currency, having negotiated a lower price from the \$1500 originally quoted.

5. The defendant and the CS engaged in a brief conversation and then walked together to a Lexus that the defendant had driven to the location. At that time the defendant handed the CS an additional ammunition for the Draco pistol.

6. The defendant stipulates and agrees that on October 1, 2020, he knew that he had been previously convicted of a crime punishable by a term of incarceration exceeding one year (i.e. a felony), and that he knowingly possessed a Romarm/Cugir Mini Draco pistol bearing serial number 0441-2018/RO; one 30-round drum magazine; and 22 rounds of 7.62x39 mm ammunition.

7. The parties stipulate and agree that the firearm referenced in this Statement of Facts and in Count One of the pending indictment is a firearm within the meaning of the law in that it is designed to expel a projectile by means of an explosive.

8. The parties further stipulate and agree that the firearm and ammunition referenced in the pending indictment and set forth in this Statement of Facts traveled in interstate and/or foreign commerce in that the firearm and ammunition were manufactured outside of the Commonwealth of Virginia.

9. This Statement of Facts includes those facts necessary to support the plea agreement between the defendant and the United States. It does not include each and every fact

known to the defendant or to the United States, and it is not intended to be a full enumeration of all of the facts surrounding the defendant's case.

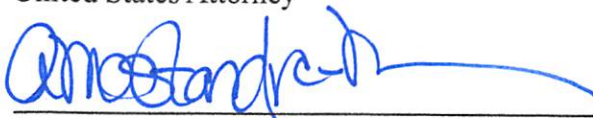
10. The actions of the defendant, as recounted above, were in all respects knowing and deliberate, and were not committed by mistake, accident, or other innocent reason.

Respectfully submitted,

Jessica D. Aber  
United States Attorney

Date: February 23, 2022

By:




Angela Mastandrea-Miller  
Assistant United States Attorney

After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, SHADONTA LATEEF BEANE, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

  
SHADONTA LATEEF BEANE      2/23/2022  
Date

I am Amy L. Austin, Esq., defendant's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.

  
Amy L. Austin, Esq.      2-23-2022  
Attorney for Shadonta Lateef Beane      Date

U. S. DEPARTMENT OF JUSTICE  
Statement of Special Assessment Account

This statement reflects your Special Assessment only. There may be other penalties imposed at sentencing.

ACCOUNT INFORMATION	
CRIM. ACTION NO.:	3:21cr054-DJN
DEFENDANT'S NAME:	Shadonta Lateef Beane
PAY THIS AMOUNT:	\$100.00

**INSTRUCTIONS:**

**1. MAKE CHECK OR MONEY ORDER PAYABLE TO:**

CLERK, U.S. DISTRICT COURT

**2. PAYMENT MUST REACH THE CLERK'S OFFICE BEFORE YOUR SENTENCING DATE.**

**3. PAYMENT SHOULD BE SENT TO:**

	In-Person (9 AM to 4 PM)	By Mail:
Alexandria Cases:	Clerk, U.S. District Court 401 Courthouse Square Alexandria, VA 22314	
Richmond Cases:	Clerk, U.S. District Court 701 East Broad Street, Suite 3000 Richmond, VA 23219	
Newport News Cases:	Clerk, U.S. District Court 2400 West Ave., Suite 100 Newport News, VA 23607	
Norfolk Cases:	Clerk, U.S. District Court 600 Granby Street Norfolk, VA 23510	

**4. INCLUDE DEFENDANT'S NAME ON CHECK OR MONEY ORDER.**

**5. ENCLOSE THIS COUPON TO ENSURE PROPER AND PROMPT APPLICATION OF PAYMENT.**